

<b>UNITED STATES BANKRUPTCY COURT DISTRICT OF NEW JERSEY</b>	
<b>Robertson, Anschutz, Schneid &amp; Crane LLC</b> 10700 Abbott's Bridge Road, Suite 170 Duluth, GA 30097 Telephone Number 470-321-7112 Attorneys For Secured Creditor	CASE NO.: 20-15557-MBK  CHAPTER 13  <b>Objection to Confirmation of Debtor's Chapter 13 Plan</b>
<b>In Re:</b>  <b>Tracey L. Gladden,</b>  <b>Debtor.</b>	

**OBJECTION TO CONFIRMATION OF DEBTOR'S CHAPTER 13 PLAN**

Home Point Financial Corporation ("Secured Creditor"), by and through its undersigned counsel, objects to confirmation of Debtor's Chapter 13 Plan (DE #2 ), and states as follows:

1. Debtor, Tracey L. Gladden, ("Debtor"), filed a voluntary petition pursuant to Chapter 13 of the Bankruptcy Code on April 14, 2020.
2. Secured Creditor holds a security interest in the Debtor's real property located at 7 River Lane, Delanco, NJ 08075, by virtue of a Mortgage recorded on January 4, 2019 in Book OR13369, at Page 7220 of the Public Records of Burlington County, NJ. Said Mortgage secures a Note in the amount of \$147,205.00.
3. The Debtor filed a Chapter 13 Plan on April 14, 2020.
4. The Plan fails to include payments toward the arrears owed on the Note and Mortgage with Secured Creditor. It is anticipated that Secured Creditor's claim will show the pre-petition arrearage due Secured Creditor is approximately \$8,159.14, whereas the Plan treats Secured Creditor as unaffected. Therefore, the Plan is not in compliance with the requirements of 11 U.S.C. §§ 1322(b)(3) and 1325(a)(5) and cannot be confirmed. Secured Creditor objects to any plan which proposes to pay it anything less than

\$8,159.14, subject to the final figures in the anticipated proof of claim, as the pre-petition arrearage over the life of the plan.

**WHEREFORE**, Secured Creditor respectfully requests this Court sustain the objections stated herein and deny confirmation of Debtor's Plan, and for such other and further relief as the Court may deem just and proper.

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By: /s/Aleisha C. Jennings  
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### **CERTIFICATION OF SERVICE**

1. I, Aleisha C. Jennings, represent Home Point Financial Corporation in this matter.
2. On May 14, 2020, I caused a copy of the following pleadings and/or documents to be sent to the parties listed in the chart below: Objection to Confirmation of Debtor's Chapter 13 Plan
3. I certify under penalty of perjury that the above documents were sent using the mode of service indicated.

May 14, 2020

Robertson, Anschutz, Schneid & Crane LLC  
Attorney for Secured Creditor  
10700 Abbott's Bridge Road, Suite 170  
Duluth, GA 30097  
Telephone Number 470-321-7112

By: /s/Aleisha C. Jennings  
Aleisha C. Jennings, Esquire  
NJ Bar Number AJ-2114  
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<b><u>Name and Address of Party Served</u></b>	<b><u>Relationship of Party to the Case</u></b>	<b><u>Mode of Service</u></b>
Brad J. Sadek Sadek and Cooper 1315 Walnut Street Ste 502 Philadelphia, PA 19107	Attorney for Debtor	<input type="checkbox"/> Hand-delivered <input checked="" type="checkbox"/> Regular mail <input type="checkbox"/> Certified Mail/RR <input type="checkbox"/> E-mail <input checked="" type="checkbox"/> Notice of Electronic Filing (NEF) <input type="checkbox"/> Other  (as authorized by the court*)
Tracey L. Gladden 7 River Lane Delanco, NJ 08075	Debtor.	<input type="checkbox"/> Hand-delivered <input checked="" type="checkbox"/> Regular mail <input type="checkbox"/> Certified Mail/RR <input type="checkbox"/> E-mail <input type="checkbox"/> Notice of Electronic Filing (NEF) <input type="checkbox"/> Other  (as authorized by the court*)
Albert Russo Standing Chapter 13 Trustee CN 4853 Trenton, NJ 08650-4853	Standing Chapter 13 Trustee	<input type="checkbox"/> Hand-delivered <input checked="" type="checkbox"/> Regular mail <input type="checkbox"/> Certified Mail/RR <input type="checkbox"/> E-mail <input checked="" type="checkbox"/> Notice of Electronic Filing (NEF) <input type="checkbox"/> Other  (as authorized by the court*)
U.S.U.S. Trustee US Dept of Justice Office of the US Trustee One Newark Center Ste 2100 Newark, NJ 07102	U.S. Trustee	<input type="checkbox"/> Hand-delivered <input checked="" type="checkbox"/> Regular mail <input type="checkbox"/> Certified Mail/RR <input type="checkbox"/> E-mail <input checked="" type="checkbox"/> Notice of Electronic Filing (NEF) <input type="checkbox"/> Other  (as authorized by the court*)